

Attorney for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS**

EMERENCIANA PETER-PALICAN	CIVIL. ACTION NO. 07-0022
))
Plaintiff,)
)	ANSWER TO FIRST SET OF
-v-)
)	INTERROGATORIES AND
)	REQUEST FOR PRODUCTION OF
)	DOCUMENTS
GOVERNMENT OF THE)
COMMONWEALTH OF THE)
NORTHERN MARIANA ISLANDS,)
and TIMOTHY P. VILLAGOMEZ)
in his official and individual capacities,)
))
Defendants.)
))

Comes now Emerenciana Peter-Palican and for this her answers to interrogatories and response to request for production of documents states:

ANSWERS TO INTERROGATORIES

Interrogatory no. 1.

After the jury had left the courtroom, Judge Munson asked if there were anything else to be addressed. At that time I stated that I wanted my civil service position back with a lateral transfer. Mr. Dollison then said "Mrs. Palican are you going to give up the special

protected in civil service and then we ended up in here." Mr. Dollison then said, [B]ut your
special assistant position is also protected under the constitution." I said "Oh, I didn't know
that." Judge Munson, addressing Mr. Dollison, then asked isn't this position just effective
under the Babauta-Benavente administration. Mr. Dollison then said, "[N]o, your honor,
under the constitution she can only be terminated for cause." Judge Munson then said
words to the effect that if this case arises again will the Attorney General's Office represent
Mrs. Palican. Mr. Dollison then said, "Yes"

Interrogatory no. 2.

Yes.

Interrogatory no. 3.

A. I spoke with Juan I. Tenorio a few weeks after the trial while both of us
were at a Youth Affairs Convention. I mentioned to him that I had been unaware until the
statements after trial that the special assistant for women's affairs could only be terminated
for cause. Mr. Tenorio said yes, that the only way a person could leave the position is by
resigning or being terminated for cause.

B. I spoke with Frank Gibson, a few days after the end of the trial on the
phone. He was employed in the personnel department and I spoke with him at times
regarding personnel matters. At one conversation I commented about the holder of the
special assistant for women's affairs position being protected by the constitution. Mr.

Interrogatory no. 4.

- A. NOPA- I don't recall receiving this document until July 2002, or later.
- B. Request for Personnel Action - I don't recall receiving this document until July 2002, or later.
- C. Conditions of Employment - I received this document on the date I signed it.

Interrogatory no. 5.

Yes

Interrogatory no. 6.

I was very active and vocal in the gubernatorial campaign which Governor Filial won. I supported Governor Babauta publicly, attending and participating in rally's, street demonstrations, and soliciting votes.

RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS

- 1. Plaintiff objects to this request as being overly broad and not susceptible of any precise delineation as to documents requested.

I declare under penalty of perjury that the answers to interrogatories are true and correct to the best of my knowledge.

Emerenciana Peter-Palican

12/22/2002

Dated this 22nd day of December, 2007.

DOUGLAS F. CUSHNIE
Attorney for Plaintiff

/s/

DOUGLAS F. CUSHNIE